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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

GREGORY A STRASBURG, Individually and as Trustee of the GREGORY A. STRASBURG REVOCABLE TRUST dated 4/8/2003,

Plaintiff,

VS.

*M/Y JUST A NOTION*, Official Number 1089525, her engines, tackle, furniture and appurtenances, *in rem*; PETER BLAIR, *in personam*; JIM SINGLETON, *in personam*; and THE YACHT CLUB, LLC., a Nevada Corporation

Defendants.

CASE NO.: 08CV21 JLS(BLM)

IN ADMIRALTY

STATEMENT OF RIGHT OR  
INTEREST OF DEFENDANT THE  
YACHT CLUB

Federal Rules of Civil Procedure  
Supplemental Rules for Certain  
Admiralty and Maritime Claims, Rules  
C and D

COMES NOW Peter Blair, as a managing member and President of Defendant THE YACHT CLUB, LLC., a Nevada Corporation, and pursuant to Federal Rules of Civil Procedure Supplemental Rules for Certain Admiralty and Maritime Claims Rules C and D asserts a right to possession and ownership interest in the vessel known as *M/Y JUST A NOTION*, Official Number 1089525, and all of her engines, tackle, accessories, equipment, furnishings and appurtenances (“DEFENDANT VESSEL”), and in support thereof, certifies and declares as follows:

1           1.       I, Peter Blair, am the President and Manager of the Yacht Club LLC. I have  
2 personal knowledge of all of the matters stated herein;

3           2.       On or about April of 2006, Plaintiff, GREGORY A STRASBURG, as Trustee of  
4 the GREGORY A. STRASBURG REVOCABLE TRUST, executed documents whereby he  
5 transferred any and all interest he had in the vessel which is the subject of this litigation to Yacht  
6 Club, LLC and accordingly, Yacht Club, LLC has a possessory interest in this vessel;

7           3.       In addition to this possessory interest, Yacht Club LLC has incurred liabilities for  
8 the operations, maintenance, and repairs of the vessel, including, but not limited to;

- 9           a)       Outstanding fuel bills to High Seas Fuel, Inc.;
- 10          b)       Outstanding invoice to Pacific Propeller;
- 11          c)       Outstanding invoice to Kona Kai for mooring fees and/or electoral hook ups;
- 12          d)       Overboard life raft repair company for work performed on inspection of the life  
13 raft and battery replacement to Epirb;
- 14          e)       Outstanding obligations exceeding \$150,000, plus accrued interest and fees for  
15 monies borrowed from Jim Singleton;
- 16          f)       Unpaid salary and reimbursement of expenses in the amount in excess of \$60,000  
17 to David Moniz;
- 18          g)       Unpaid invoices for labor and reimbursement of expenses in the amount in excess  
19 of \$30,000 to Kim Warner;
- 20          h)       Unpaid invoices for labor and reimbursement of expenses in the amount in excess  
21 of \$300,000 to Peter Blair.

22           4.       In addition to these obligations there is certain equipment onboard the vessel  
23 which belongs to Yacht Club LLC, these includes surf boards, kayaks, diving gear, fishing gear,  
24 and the dingy, which is *TT Just a Notion*.

25           5.       Finally, pursuant to the business plan which is signed by all, including the  
26 Plaintiff in this action, Yacht Club LLC sold a fractional ownership to Mr. Rob LaBreche. Mr.  
27 LaBreche has paid \$50,000 for his fractional ownership along with a promissory note to pay the  
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1 balance of the \$190,000 membership.

2 6. It was also agreed that Yacht Club LLC had the right to sell the vessel for the  
3 purpose of paying off all of the above obligations. Accordingly, Yacht Club has a possessory  
4 interest for purpose of sale of the vessel, a possessory interest because of ownership of the vessel,  
5 and an economic interest because of the fractionalized ownership of the vessel, and fees, costs,  
6 and labor invested into the vessel;

7 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
8 true and correct.

9 Executed this 22<sup>nd</sup> day of January, 2008 at San Diego, California.

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12 Peter Blair as President/THE YACHT  
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